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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

19 Aaron Feld,  
20 Plaintiff,  
21 v.  
22  
23 Navient Solutions, LLC and Pioneer  
24 Credit Recovery, Inc.,  
25 Defendants.

Case No.: 2:20-cv-01156-GMN-NJK  
Dept No.:

**Unopposed Motion and Order for  
an extension of time for Plaintiff to  
respond to Defendants' Motion to  
stay case**

1                   Aaron Feld (“Plaintiff”), with notice to and approval of, Navient  
2 Solutions, LLC and Pioneer Credit Recovery, Inc. (“Defendants”), by counsel,  
3 hereby submits this Unopposed Motion and Order for an extension of time for  
4 Plaintiff to respond to Defendants’ Motion to stay case, filed on March 1,  
5 2020. This is the first request for an extension of this deadline.

6                   The extension is sought because the motion is complex as it involves  
7 ongoing litigation in the United States Supreme Court on issues that are also  
8 being briefed in other circuit and district courts. As such, counsel is requesting  
9 more time to prepare an appropriate response.

10                  At this time in the litigation, discovery is essentially closed and the next  
11 court deadline is on April 12, 2021 for the filing of dispositive motions. Thus,  
12 there is no risk of prejudice to any party.

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1           In good ~~faith~~ and not for the purposes of delay, Plaintiff, with notice to  
2 Defendants and approval to file unopposed, pleads the Court to Order that  
3 Plaintiff's response to the pending Motion to stay case shall be due on or  
4 before **March 29, 2021.**

5           Dated: March 12, 2021.  
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7           **FREEDOM LAW FIRM, LLC**

8           /s/ Gerardo Avalos

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9           Gerardo Avalos, Esq.  
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12           *Counsel for Plaintiff*

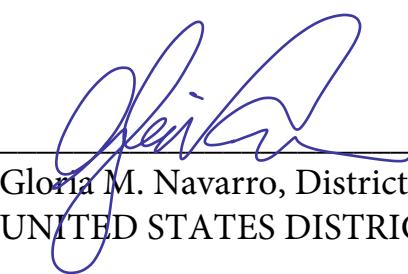
13           **HOLLEY DRIGGS**

14           Approved to file unopposed

15           Michael Ayers, Esq.  
16           800 S. Meadows Parkway, Suite 800  
17           Reno, Nevada 89521  
18           *Counsel for Defendants*

19           **IT IS SO ORDERED.**

20           Dated this 12 day of March, 2021.

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22           \_\_\_\_\_  
23           Gloria M. Navarro, District Judge  
24           UNITED STATES DISTRICT COURT  
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